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Riley Schreiber
Mechanical Service
FRA Representative

Canadian National / Illinois Central
17550 South Ashland Avenue
Homewood, IL USA 60430
Telephone: (708) 332-6607
Fax: (708) 332-3845
Cellular: (708) 227 0267
Riley.Schreiber@cn.ca

FEDERAL RAILROAD
ADMINISTRATION

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OFFICE OF CHIEF COUNSEL

FRA-2004-189607

August 18, 2004

Mr. Edward W. Pritchard
Director, Office of Safety
Assurance and Compliance
Federal Railroad Administration
1120 Vermont Avenue N.W.
Washington D.C. 20005

The CN has noticed that the UP Railroad has a computer generated Blue Card in the cab of their locomotives. We contacted the UP Railroad and spoke to a Mr. Steve Beckwith, who advised the CN that the UP has a waiver to store the FRA Blue Card (FRA F6180-49A) electronically, without signatures.

At this time, the CN requests a waiver to the Code of Federal Regulations, part 229.23(d), the recording of periodic inspections. The CN will record the periodic inspections, without signatures, electronically. The worksheets that the CN uses on the periodic inspections would have the signature of the person conducting the inspection on item codes 1,2,3,4,5 and 7 in item 15 and the meter, handbrake and airbrake in item 21, along with the certification signatures. These forms will be kept on file at the inspection location. The only form the CN will record electronically is form FRA F6180-49A.

If you have any questions please contact me at (708) 332 – 6607.

Thank you, for your assistance in this matter.

Sincerely,

Robert R. Schreiber
Mechanical Service
FRA Representative
CN Railroad